

Ekwok Village Council
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On October 25, 2011 the Nushagak-Mulchatna Watershed Council at its meeting in Ekwok, Alaska endorsed a set of policy guidelines for mining within the watershed. The document is entitled *Standards and Practices for Environmentally Responsible Mining in the Nushagak River Watershed (Standards and Practices)*. A copy accompanies this letter.

The Nushagak-Mulchatna Watershed Council (Council) was formed in 1998. The Council is primarily an association of tribes, municipal governments and Native corporation landowners who have joined together to protect the quality of the waters of the Nushagak River Watershed. In 2005 the Council undertook a process to develop a land and water conservation plan focusing primarily on the protection of habitat for salmon and other resources important for the subsistence needs of watershed residents. The process was completed and the Council approved and published the *Nushagak River Watershed Traditional Use Area Conservation Plan* in November of 2007 (Conservation Plan).

The Conservation Plan identified potential threats to habitat within the watershed and outlined a series of actions to address those threats. One of the potential threats identified was mining, in particular the potential development of large scale open pit mines in the watershed. To address the potential impacts that such mining could have on the habitat in the watershed the Council determined that an assessment of the risks to salmon posed by the development of large mining in the watershed was necessary. Such a risk assessment was undertaken by The Nature Conservancy in 2008 and completed in 2010. The report entitled *An Assessment of Ecological Risk to Wild Salmon Systems from Large-scale Mining in the Nushagak and Kvichak Watersheds of the Bristol Bay Basin*, Ecology & Environment was published in October of 2010.

Upon completion of the risk assessment the next action identified in the Conservation Plan was to address the risks identified in the assessment through the development of a framework for responsible mining in the watershed. The *Standards and Practices* document is that framework. The document represents the Council's best efforts to outline a process that assures the welfare of the fish resources of the watershed will not be compromised by mineral development and that the people who live in the watershed, particularly the indigenous residents who continue to subsist on watershed resources, will be accorded a meaningful opportunity to participate in the decision making process.

The Council hopes these *Standards and Practices* will be a useful reference for potential developers; State, Federal and local regulators; and for private and public landowners in the watershed. The *Standards and Practices* is intended to be a working document – one the Council will revisit and change as new standards for mining and public engagement evolve and technology improves. However, the core principles of the document are not expected to change: First, watershed residents must be meaningfully engaged in all phases of a mineral development; and Second, mineral development should not occur if the fish resources of the watershed will be placed at significant risk.

On behalf of the Nushagak-Mulchatna Watershed Council I thank you for your consideration.



Luki Akelkok Sr.
Chairman, Nushagak-Mulchatna Watershed Council
and Chief, Ekwok Village Council